

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Civil Action No. 2:23-CV-00379-JRG-RSP

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Civil Action No. 2:23-CV-00377-JRG-RSP

DEFENDANTS' AMENDED WITNESS LIST

Defendants T-Mobile USA, Inc. and Sprint Corp. (collectively, “T-Mobile” or “Defendants”) provide the following amended list of witnesses that they presently anticipate they may or will call in this Action.

Defendants reserve all rights to call any witnesses that Plaintiff Headwater Research LLC (“Headwater” or “Plaintiff”) identifies on its witness list and/or calls at trial, any witnesses for the purposes of impeachment or rebuttal, and any witnesses for whom Defendants have provided deposition designations (whether initial, counter, or reply designations). The topics of testimony set forth below are intended as general descriptions and are not intended to be limiting or exhaustive. In addition, Defendants identify as a topic of testimony for each witness any document that the witness authored or received, for which the witness is a custodian, or in which the author is cited.

Defendants expressly reserve the right to revise or supplement this initial witness list. Unless otherwise noted, where Defendants have indicated they will call or may call a witness, Defendants intend for that witness to testify either in person at trial or by deposition.

At this time, Defendants identify the following witnesses for trial:

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dr. Kevin Jeffay, University of North Carolina at Chapel Hill Infringement, validity, technical value of the '541 and '613 Patents, as described in witness's Rule 26(a)(2)(B) report.	X		

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dr. Benjamin Goldberg, New York University Functionality and operation of allegedly infringing source code, as described in witness's Rule 26(a)(2)(B) report.		X	
Dr. Thomas Hazlett, Clemson University Economic analysis and damages, as described in witness's Rule 26(a)(2)(B) report.		X	
Laura Stamm, Analysis Group Economic analysis and damages, as described in witness's Rule 26(a)(2)(B) report.		X	
Sarah Butler, National Economics Research Associates Economic and consumer research, as described in witness's Rule 26(a)(2)(B) report.		X	
Max Caldwell, T-Mobile T-Mobile's licensing practices and policies.			X
Danielle Doolittle, T-Mobile Marketing materials and customer surveys produced by T-Mobile.			X
Larissa Evans, T-Mobile Financial data related to accused instrumentalities.			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dan Garrow, T-Mobile Financial data related to accused instrumentalities.			X
Justin Kanzler, T-Mobile Financial data related to accused instrumentalities.			X
Erik Kosar, T-Mobile Operation and function of accused instrumentalities.			X
Peter Kwok, T-Mobile Operation and function of the accused instrumentalities.			X
Ryan McGinn, T-Mobile Operation and function of accused instrumentalities.			X
James Munkirs, T-Mobile Information relating to the operation and function of accused instrumentalities; information related to ItsOn's relationship and discussions with Sprint.		X	
Rahul Pal, T-Mobile Operation and function of accused instrumentalities.			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Hannah Sifuentes, T-Mobile Operation and function of accused instrumentalities; information related to ItsOn's relationship and discussions with Sprint; information related to value of ItsOn technology to Sprint; information related to prior art devices.	X		
Jason Sigg, T-Mobile ItsOn's relationship and discussions with Sprint; information related to value of ItsOn technology to Sprint.		X	
Ryan Sullivan, former T-Mobile ItsOn's relationship and discussions with Sprint; information related to value of ItsOn technology to Sprint.		X	
Mark Yarkosky, former T-Mobile ItsOn's relationship and discussions with Sprint		X	
Nathan Begeman, Apple Information related to the accused instrumentalities and prior art.			X
David Chan, Apple Information related to the accused instrumentalities and prior art.			X
Jeffrey Sharkey, former Google Information related to the accused instrumentalities and prior art.		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Kartik Venkatraman, Apple Information related to the accused instrumentalities and prior art.		X	
Amith Yamasani, Google Information related to the accused instrumentalities and prior art.		X	
Headwater Research LLC Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; operation of Headwater and any affiliated entities; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in the Asserted Patents or any embodiments thereof; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwater's claims; and settlements, licenses, and other financial interests in the Asserted Patents and/or litigation related to the Asserted Patents.	X		
Farshad Farjani, prosecuting attorney Prosecution of the asserted patents.			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
<p>Jeffrey Green, inventor</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwater's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>			X
<p>James Harris, former Headwater employee</p> <p>Information related to Headwater and ItsOn.</p>		X	
<p>Krista Jacobsen, former Headwater employee</p> <p>Prosecution of the asserted patents; historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.</p>		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
<p>Justin James, inventor</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>			X
<p>David Johnson, former Headwater employee</p> <p>Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.</p>		X	
<p>James Lavine, inventor and current Headwater consultant</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
<p>Gregory Raleigh, current Headwater lead director</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>	X		
<p>Alireza Raissinia, inventor</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>		X	
<p>Jennifer Smith, current Headwater employee</p> <p>Headwater's business.</p>			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
James Straight, former Headwater consultant Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Any witness included on Headwater's witness list.		X	
Paul Brown, UX Connect Information related to Samsung and Strategy Analytics.		X, live or by deposition	

Dated: June 16, 2025

By: /s/ Josh A. Krevitt

Josh A. Krevitt (lead attorney)
(NY Bar No. 2568228)
jkrevitt@gibsondunn.com
Katherine Q. Dominguez (NY Bar No. 4741237)
kdominguez@gibsondunn.com
Brian A. Rosenthal (NY Bar No. 3961380)
brosenthal@gibsondunn.com
Charles M. Sim (NY Bar No. 5753298)
csim@gibsondunn.com
Eli Balsam (NY Bar No. 5820493)
ebalsam@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Robert Vincent (TX Bar No. 24056474)
rvincent@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
Telephone: 214.698.3112
Facsimile: 214.571.2910

Andrew W. Robb (CA Bar No. 291438)
arobb@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
310 University Avenue
Palo Alto, CA 94301
Telephone: 650.849.5334
Facsimile: 650.849.5034

Hannah L. Bedard (DC Bar No. 230412)
hbedard@gibsondunn.com
Michelle Zhu (NY Bar No. 5919865)
mzhu@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, D.C. 20036
Telephone: 202.777.9413
Fax: 202.831.6063

Celine Crowson (D.C. Bar No. 0436549A)
Hogan Lovells

555 13th St NW,
Washington, D.C. 20004
Telephone: 202-637-5600
celine.crowson@hoganlovells.com

Tej Singh (California Bar No. 286547)
Yi Zhang (California Bar No. 342823)
Kyle Xu (California Bar No. 344100)

Hogan Lovells

4 Embarcadero Center Suite 3500
San Francisco, CA 94111
Telephone: 415-374-2300
tej.singh@hoganlovells.com
yi.zhang@hoganlovells.com
kyle.xu@hoganlovells.com

Melissa R. Smith
melissa@gillamsmithlaw.com
GILLIAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via electronic mail to all opposing counsel of record on June 16, 2025.

/s/ Josh A. Krevitt

Josh Krevitt